

OGC Has Reviewed

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General Counsel

9 November 1956

ATTENTION: [REDACTED] Assistant General Counsel
Acting Chief, Regulations Control Staff

Proposed Instruction Sheet

REFERENCE: Memorandum dated 27 August 1956 to the Regulations Control
Staff from [REDACTED] Assistant General Coun-
sel, subject: Device to Maintain Regulatory Sets on a
Current Basis

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1. In the referenced memorandum, it is proposed that an Instruction Sheet be published with each regulatory issuance. As you have pointed out, the objective of your proposal is twofold, namely, (a) to maintain sets of regulatory material on a current basis, and (b) to enable all users to determine which regulations were in effect at any given time.

2. It is noted that the proposal also contains a criticism of the Agency regulatory system as well as a history of the system. The publication of the criticism, as proposed, will serve no useful purpose and at the same time could do irreparable harm. No prudent individual can deny that "improvement" of any office of this Agency is desirable and possible. However, such general criticism and a call for "improvement" of an office, published for Agencywide distribution, will neither improve a condition nor will it develop confidence or respect for the office concerned. If the publication of some historical background is needed to assist the administrative officers of the Agency in better understanding the regulatory system and their responsibilities in connection with it, then a brief handbook could reiterate what the DCI has already prescribed in [REDACTED]

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3. It is the opinion of this Staff that the publication of an Instruction Sheet, as suggested, should not be adopted for the following reasons:

- a. The proposal calls for an Instruction Sheet to accompany each new regulatory issuance and that these sheets would be filed in the manual. In 1955 this Staff published 342 issuances, and in the first six months of 1956, we published 136 issuances. If this plan were in effect, we would have an accumulative volume of approximately

500 pages as Instruction Sheets alone and with the present regulatory program, the publication of Instruction Sheets would continue to increase at approximately the same rate.

b. This Staff, on 23 April 1956, published a check list of regulatory issuances which included all material in effect on 23 April 1956. The purpose of the regular publication of such a check list is to serve as a device for manualholders to maintain sets of regulatory issuances on a current basis. We are in the process at this time of issuing a current check list for both headquarters and field regulatory material. Considering certain improvements made in the check list, we feel that the publication of such check lists is adequate to meet the needs of the Agency. In connection with the needs of the Agency, it is also felt that it is not necessary for each and every manualholder to have an Instruction Sheet, as suggested by your Office, since most manualholders are only interested in what is current rather than what was in effect at some given date. As a matter of fact, it would appear that your Office would be the only one that would need such a publication.

c. This Staff has been using Instruction Sheets to accompany certain types of regulatory material, i.e., where it is felt that manualholders have a real need for instructions, such as the filing of a change to a regulation (see Change 1 to [redacted] dated 2 October 1956). We have also been using Information Sheets for the purpose of advising manualholders of the nature of the revisions (see [redacted] dated 17 October 1956).

4. This Staff deeply appreciates the time and effort spent by your Office in proposing the publication of an Instruction Sheet with each piece of regulatory material. As a result of your proposal, many ideas have been projected, and it has certainly given us food for thought on this subject. If you still feel that your proposal should be given further consideration, it is suggested that you refer the matter to the ADD/S for review.

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